

From: DOMGWIA.Internet.jwalker@orrick.com
Sent: Monday, September 26, 2005 9:53 AM
To: IMCEAGWISE-DOMGWIA+2EInternet+2Ejwalker+40orrick+2Ecom@finnegan.com; Hornick, John
Cc: Bhanu.Sadasivan@hellerehrman.com; dan.hampton@hklaw.com; Facebook/Connectu-OHSandCo-Counsel@orrick.com; KHalpern@Orrick.com; robert.hawk@hellerehrman.com; Rinaldi, Cynthia; Hart, Pat; Grabow, Troy
Subject: RE: Meet and Confer re ConnectU Deposition
Attachments: TEXT.htm; Mime.822



TEXT.htm (6 KB) Mime.822 (13 KB)

Dear John:

As stated repeatedly, the Facebook Defendants cannot further supplement their previous extensive designation of transcript testimony, as doing so would minimize ConnectU's failure to meet its discovery obligations and the degree to which the purposes of Rule 30(b)(6) were thwarted at deposition. The Facebook Defendants view further requests for elaboration as a mere attempt to delay discovery, especially since even such heroic measures would only trigger your "consideration".

Sincerely,

Joshua Walker

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